

MEMORANDUM

SUBJECT: Consultation on Ozone Network Design

**FROM: Lewis Weinstock, Group Leader
Ambient Air Monitoring Group
Office of Air Quality Planning and Standards**

**TO: Kyndall Barry, Designated Federal Officer
Ambient Air Monitoring & Methods Subcommittee
Clean Air Scientific Advisory Committee
EPA Science Advisory Board Staff Office**

In March 2008, the final rule for the Ozone NAAQS was published (73 FR 16436). The revised both the primary and secondary standards and set identical, 8-hour standards of 0.075 ppm expressed to three decimal places for both public health and welfare. EPA committed to develop separate rulemaking to support changes in the monitoring network requirements based on the revisions of the primary and secondary O₃ NAAQS. Changes to the required O₃ monitoring season are also under consideration.

Attached is the review document in which the potential revisions to the O₃ monitoring network are outlined. This document has been prepared by staff from the Ambient Air monitoring Group in the Office of Air Quality Planning and Standards and will be the focus of a consultation by the CASAC AAMMS on February 10, 2009. Please forward this memo and the attached file to the Subcommittee to prepare for the meeting. We look forward to the upcoming discussions with AAMMS. Please do not hesitate to contact me if you have any questions regarding the documents.

Charge to the CASAC AAMMS

Within each of the sections of the document, we ask the Subcommittee to address the following:

Urban Network Design Requirements

1. Considering the ozone minimum monitoring requirements that are already promulgated through 40 CFR Part 58, is the considered change to these requirements sufficient to ensure a minimally adequate network in urban areas?
2. We are considering a timeline that would require newly required ozone monitors to be operational no later than January 1, 2011, based on the expectation that final rulemaking will be completed in 2009. Is this schedule appropriate or should EPA consider providing an additional year for new monitors to be deployed (or relocated)? What would be the advantages or disadvantages of a staggered deployment schedule?

Non-Urban Network Design Requirements

1. We are considering a new requirement that each State operate a minimum of three non-urban ozone monitors to meet certain objectives (described above). Considering the stated objectives of the non-urban ozone monitoring requirements, is three required monitors per state sufficient?
2. What factors should be considered in the siting of ozone monitors to assess impacts on ozone sensitive vegetation in national parks, wilderness areas, and other ecosystems?
3. In addition to the objectives that have been described for non-urban ozone monitors, what other objectives should be considered in the final network design? How would the consideration of additional objectives, if any, effect the minimum number of non-urban required monitors?
4. Current ozone monitoring regulations (described in Appendix E of 40 CFR part 58) include requirements for station and probe siting (e.g., vertical distance of inlets, set-back distances from roadways). Are these requirements (that have been developed for urban monitors) appropriate for non-urban ozone monitors? What changes, if any, should be considered?
5. We believe that States should have the option of designating that existing non-urban ozone monitors that are potentially operated by another agency (e.g., CASTNET monitors operated by the National Park Service) be utilized for meeting certain non-urban minimum monitoring requirements. What factors should States use to determine if such monitors are appropriate to include in their networks?

Ozone Monitoring Season

1. We are considering changes to the required ozone monitoring seasons based on analyses of the patterns of ozone exceedances and occurrences of the Moderate level of the Air Quality Index, during periods outside of the currently required seasons. What other factors should be considered, if any, in the determination of the length of the required monitoring season for each State?
2. We believe that ozone monitors that are located at NCore stations should be operated on a year-round monitoring schedule. Under what circumstances might it be appropriate to require year-round monitoring at other stations beside NCore?
3. We are considering that changes to the required ozone monitoring season be applicable to existing monitors beginning in 2010, one year ahead of the deployment schedule for newly required ozone monitors. Is this schedule reasonable for existing monitors?